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Attorneys for Plaintiffs and Opt-In Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

KELLY CAHILL and SARA JOHNSTON,
individually and on behalf of others similarly
situated,

Plaintiffs,

v.

NIKE, INC., an Oregon Corporation,

Defendant.

Case No. 3:18-cv-01477-JR

**CONSENT TO BECOME PARTY
PLAINTIFF IN
COLLECTIVE ACTION UNDER 29
U.S.C. § 216(b)**

1. I, Donna J. Olson, consent to be a party plaintiff in the above-listed action under 29 U.S.C. § 216(b), and agree to be bound by any settlement or judgment of the Court in the action.

2. I worked for Defendant Nike, Inc. in and around Beaverton, Oregon from 1991 through June 2017, first as a security supervisor for campus security, then as the World Headquarters Security Manager. In my role as Security Manager, I was responsible for the physical security and oversight of multiple office locations in the United States and Canada.

3. I performed well in my roles. Over the last five years as the Security Manager for the United States facilities, I was rated “highly successful” for three years and “successful” for two years.

4. After I retired from Nike in 2017, my job was split into two positions. One of the males who replaced me was promoted to Senior Manager. The male that was promoted to Senior Manager was previously my direct report. The other male was promoted to Director. Thus, at least one of my replacements, the Director, was given a larger salary than what I received prior to my retirement in June 2017.

5. All of my male peers were Directors, which is a level above Manager. However, I was never promoted to a level higher than Manager.

6. During my last five years at Nike, I expressed an interest in being promoted to Director on multiple occasions. My boss informed me that if I retired, my replacement would be given a Director position. But despite my highly successful performance and the fact that I was doing Director-level work, I was not promoted to Director. I was told I needed to be at the top segment of the U-Band before promotion to an E-Band Director position. I was in a U-Band position for 17 years. Because I had been a U-Band for such a long time, I believed I was underpaid and I expressed my concern to my manager.

7. On multiple occasions, my boss informed me that based on my current responsibilities, I should have been promoted to the Director position.

8. I was underpaid for my position. Because all of my male peers with similar

responsibilities and jobs were Directors, they were paid more than me. Additionally, the Directors had the ability to receive stock from Nike. Because I was not a Director, I did not have the opportunity to receive stock.

9. I received two times pay in March 2017.

10. Because I was not promoted—despite doing Director-level work—I earned less than I was entitled to, had my title and band level reflected my job responsibilities. Also, this constant failure to promote was demoralizing and caused me to decide to leave Nike. The suppression of my promotion from Manager to Director became especially apparent considering that once I retired, one of my male replacements was given the Director-level position I had requested and was denied repeatedly.

11. I authorize Plaintiffs' counsel to file this consent with the Clerk of the Court.

12. Upon consideration of my rights with respect to my legal representation, I hereby authorize the named Plaintiffs' counsel (Goldstein, Borgen, Dardarian & Ho; Ackermann & Tilajef PC; India Lin Bodien Law; and Markowitz Herbold PC) to make decisions with respect to the conduct and handling of this action, including the settlement thereof, as they deem appropriate or necessary.

Please type or print in ink the following:

Name: Donna J. Olson

Address: [REDACTED]

[REDACTED] [REDACTED] [REDACTED]
(City) (State) (Zip)

Email: [REDACTED]

Tel: [REDACTED] [REDACTED]
(Day) (Evening)

Date: 11/05/2018

Donna J. Olson

Signature

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